



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

---

AAS/RMP  
F. #2021R00600

271 Cadman Plaza East  
Brooklyn, New York 11201

September 20, 2024

Kenneth Abell  
Jarrod L. Schaeffer  
Abell Eskew Landau LLP  
256 Fifth Avenue, 5th Floor  
New York, NY 10001

Seth DuCharme  
Nicole Boeckmann  
Bracewell LLP  
31 W. 52nd Street, Suite 1900  
New York, NY, 10019-6118

By Email and ECF

Re:     United States v. Sun, et. al.  
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

Enclosed please find materials produced in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which are contained on hard drives produced separately to counsel for the respective defendant.

I.     The Government's Discovery

Please find the following enclosed for counsel for Linda Sun:

| Bates No.  | Description of Item   |
|------------|---|
| SUN_000001 | Hard drive containing an Extraction of Linda Sun's iPhone 14 Pro and its associated Cellebrite Report |

Please find the following enclosed for counsel for Chris Hu:

| Bates No. | Description of Item  |
|-----------|--|
| HU_000001 | Hard drive containing an Extraction of Chris Hu's iPhone 14 Pro Max and its associated Cellebrite Report |

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Alexander A. Solomon  
Alexander A. Solomon  
Robert M. Pollack  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures

cc: Clerk of the Court (BMC) (by ECF) (without enclosures)